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Tire Operations, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF WYOMING**

AARON RICHARD,
Plaintiff,

vs.

BRIDGESTONE AMERICA TIRE
OPERATIONS, LLC; FEDEX GROUND
PACKAGE SYSTEM, INC.; and JOHN
DOE CORPORATIONS 1-3

Defendants.

Civil No. 18-CV-112-SWS

**DEFENDANT BRIDGESTONE
AMERICAS' MOTION FOR
SUMMARY JUDGMENT**

Defendant Bridgestone Americas Tire Operations, LLC ("Bridgestone Americas")
hereby moves the Court, pursuant to Federal Rule of Civil Procedure 56(a), for summary
judgment on all claims against it in this matter.

As is more fully set forth in the accompanying memorandum and exhibits, all parties in this case have now disclosed their retained expert witnesses and the reports of those witnesses. Those disclosures and reports make it clear that no expert witness endorsed by any party in this case will contend that the product at issue was defective, deficient, or inadequate as originally produced and sold by Bridgestone Americas nor will any of them contend that Bridgestone Americas acted improperly with respect to that product. As expert testimony would be required to establish liability in a case of this type, and no such testimony has been disclosed, there can be no issue as to any material fact and Bridgestone Americas is entitled to judgment as a matter of law.

DATED this 10th day of May, 2019.

/s/ Robert Tonn

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing **Defendant Bridgestone Americas'**
Motion for Summary Judgment was filed electronically through the CM/ECF system on this
10th day of May, 2019 and thereby served upon the following:

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